



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

May 15, 2017

DON LININGER, CHIEF
WASTE REMEDIATION AND PERMITTING BRANCH
US EPA REGION 7
11201 RENNER BLVD.
LENEXA, KS 66219

Re: Electrolux Facility, Jefferson, IA; 2020 Corrective Action Universe,
EPA ID# IAD0470555140

Dear Don:

The Iowa Department of Natural Resources (DNR) has recently received an application to enroll the above-referenced site in the Iowa Land Recycling Program.

Our understanding from the applicant is that the EPA has approved such a request, and in a recent conversation with you, DNR contaminated site staff were surprised to learn that you do not consider this site to be within the RCRA Corrective Action Universe. A review of DNR's records shows that as recently as 2013, EPA notified Electrolux's counsel that the site was part of the 2020 Corrective Action Universe because the EPA had deemed the site appropriate to address using the RCRA Corrective Action Program. Since then, site testing has shown continued significant exceedances of standards for various pollutants in the groundwater. Additionally, recent sampling conducted by the City of Jefferson suggests that contamination from the site is migrating toward the City's water supply wells. As such, DNR is requesting a formal statement from EPA addressing whether, and why, the site is no longer considered appropriate for the RCRA Corrective Action Program.

The current MOU between DNR and EPA would appear to prohibit the enrollment of this site in the LRP due to the significant hazardous contamination remaining on the site. Even if the site were enrolled in the LRP program, DNR would require additional remediation at the site including completion of mapping of the contamination plume and treatment. DNR cannot simply allow the site to be capped and fenced off. Additionally, if the remediation of the site is ineffective under the LRP, the EPA would need to re-establish RCRA Corrective Action oversight.

RCRA 05/15/2017



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AWM/RCAP

As such, we would request that you provide an explanation for the EPA's apparent decision to remove this site from the Corrective Action universe.

Sincerely,

A handwritten signature in black ink, appearing to read "David G. Scott", with a long horizontal stroke extending to the right.

David G. Scott, Attorney
Legal Services Bureau
Iowa Department of Natural Resources
Tel.: 515-725-8239
Email: David.Scott@dnr.iowa.gov

CC: Amie Davidson, Supervisor, Contaminated Sites Section
Greg Fuhrmann, Land Recycling Program Coordinator
Dan Cook, Contaminated Sites Section



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

MAR 05 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Article Number: 7006 2760 0000 8649 7604

Mr. Douglas S. Arnold
Alston and Bird, L.L.P.
One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

RE: Electrolux, former site of
2020 Corrective Action Universe
EPA ID # IAD0470555140

Dear Mr. Arnold:

The U.S. Environmental Protection Agency Region 7 has compiled a list of facilities deemed appropriate to address using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because this set of facilities has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. This former site of an Electrolux facility is part of the 2020 Universe because it generated, treated, stored or disposed of hazardous waste and may have releases of hazardous waste and/or hazardous constituents to the environment. As a result, the EPA expects that a final remedy will be in place (i.e., remedy construction completed) at your facility by 2020 (although actual attainment of cleanup goals through remedy implementation may take longer).

Being on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that the EPA has identified your facility, and every other facility in the 2020 Corrective Action Universe, as needing to complete RCRA Corrective Action. Our national program goal is to largely address these cleanup obligations before the end of 2020.

The EPA will work to address remediation concerns at your facility in a manner consistent with your plans for the property. If you have questions regarding this letter, please contact me at (913) 551-7478.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia L. Hutchison".

Cynthia L. Hutchison
Environmental Engineer
Missouri/Iowa Remediation and Permitting Section
Waste Remediation and Permitting Branch

cc: Mr. John Heer, Electrolux North America, Incorporated
Cal Lundberg, IDNR

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